UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF THE
REGIONAL ADMINISTRATOR

March 24, 2014

Anne Rowe
NGB/A7AM, 3501 Fetchet Avenue
Joint Base Andrews MD
20762-5157

RE: Comments on Draft Environmental Impact Statement for the Second Main Operating Base KC-46A Beddown at Alternative Air National Guard Installations (CEQ # 20140026)

Dear Ms Rowe:

The Environmental Protection Agency-New England Region (EPA) has reviewed the United States Air Force (USAF) Draft Environmental Impact Statement (DEIS) for the establishment of a Second Main Operating Base for the KC-46A refueling aircraft beddown at alternative Air National Guard Installations. We submit the following comments on the DEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes the work necessary to establish a Second Main Operating Base (MOB 2) for beddown (homebasing) of the new KC-46A refueling aircraft. The DEIS analyzes five alternative locations for the action including: Forbes Air National Guard Station (ANGS), Kansas; Joint Base McGuire-Dix-Lakehurst (JB MDL), New Jersey; Pease ANGS, New Hampshire; Pittsburgh ANGS, Pennsylvania; and, Rickenbacker ANGS, Ohio. The DEIS identifies the Pease ANGS as the preferred alternative location for the beddown.

According to the DEIS the proposed beddown would allow for efficient regional and global refueling activities to continue with the deployment of twelve new KC-46A aircraft to the selected base. Existing KC-135 aircraft at Pease ANGS (and other locations where KC-46A aircraft are deployed in the future) would be relocated and/or retired from the USAF inventory. The DEIS notes that the Pease ANGS has acceptable facilities to support the proposed beddown but that other work would be necessary to support the action including renovations/additions to existing buildings and hangars on the property; taxiway construction/upgrades; and installation of new fuel hydrants and lines. The project will also result in a 23,617 square foot increase in impervious area on the property. The DEIS explains that the construction would follow Leadership in Energy and Environmental Design (LEED) and sustainable development concepts to "achieve optimum resource efficiency, constructability, sustainability, and energy

conservation, while minimizing adverse impacts to the built and natural environments through all phases of the project's life cycle." EPA supports these sustainability efforts by the Air Force.

EPA appreciates the opportunity to review the DEIS. Based on our review, we have no objection to the preferred alternative as proposed, but we believe additional information is necessary in order to more fully describe and clarify the potential environmental impacts associated with the alternatives considered in the DEIS. We have provided specific comments in the attachment to this letter describing our concerns and look forward to working with the Air Force as necessary so they can be addressed in the FEIS. Our specific comments focus on the Pease and Pittsburgh sites, but we encourage the Air Force to provide consistent information in the FEIS for all of the locations considered to better inform comparisons among the alternatives. Based on our review we have rated the DEIS "EC-2—Environmental Concerns-Insufficient Information" in accordance with EPA's national rating system, a description of which is attached to this letter.

Please contact Timothy Timmermann, Associate Director of EPA New England's Office of Environmental Review at 617-918-1025 or timmermann.timothy@epa.gov, with any comments or questions about this letter.

Sincerely,

H. Curtis Spalding
Regional Administrator

Attachment

Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Additional Detailed Comments Regarding the DEIS for the Second Main Operating Base KC-46A Beddown at Alternative Air National Guard Installations

General Comments

Selection of the Preferred Alternative

The DEIS notes that the "…Secretary of the Air Force considered the objective screening results as well as qualitative operational factors in determining the alternative installations for the KC-46A MOB 2 mission." The USAF subsequently selected Pease ANGS based on an analysis of operational issues, the results of site surveys, and military judgment factors." The military judgment factors considered are listed in the DEIS but, beyond the general list, there is no substantive discussion provided to explain why the preferred alternative was selected. Based on the information provided in the DEIS it appears that any one of the candidate sites analyzed could be viable.

While we do not object to the selection of the preferred alternative, we believe the EIS would benefit from a more detailed description of how environmental factors were utilized to select the preferred alternative. The DEIS presents tables that outline the potential impacts if the beddown were to occur at each base but lacks any comparative analysis to explain whether one location is superior to another based on the impacts analysis. It would also be helpful to understand whether the environmental and military judgment factors align and how this might affect the selection process. As an example, if an operational goal for this round of KC-46A deployment is focused on regional refueling support along the eastern seaboard it would be a prudent move from an operational efficiency and environmental impact standpoint to select a site like Pease ANGS (as opposed to a site away from the coast) to avoid efficiency losses and potentially greater greenhouse gas (GHG) emissions from increased flight distances.

Fuel Jettisoning

The DEIS explains that airbases establish jettison areas and develop procedures to minimize the impact of fuel jettisoning on the surrounding environment. Beyond stating that the new KC-46A aircraft are also capable of jettisoning fuel, the DEIS does not explain whether this would be more or less likely than with the current fleet. The FEIS should explain the expected change in fuel jettisoning with the change in aircraft and discuss the potential health and environmental impacts on affected areas (for each of the bases under review) as it relates to the new aircraft.

Leadership in Energy and Environmental Design (LEED)

The description of the alternatives mentions that LEED and sustainable development principles will be incorporated in the construction of support facilities for the project. Additional detail should be provided in the FEIS regarding all of the proposed measures.

Miscellaneous

Although the DEIS had a Glossary, many of the acronyms were not listed. A complete list of acronyms used should be provided in the FEIS.

Pease ANGS Alternative

Air Quality--General Conformity

The Pease ANGS site is not subject to General Conformity for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS, the 2008 ozone standard), as all of New Hampshire has been designated unclassifiable/attainment for the 2008 ozone standard. However, the General Conformity requirements currently remain in place for the 1997 eight-hour ozone NAAQS for the Boston-Manchester-Portsmouth (SE) NH area. On June 6, 2013 (78 FR 34178), EPA published its proposed rule for "*Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements,*" where EPA proposed revocation of the 1997 ozone standard. EPA has not yet finalized this regulation.

EPA approved redesignation of the Boston-Manchester-Portsmouth (SE), New Hampshire moderate 8-hour ozone nonattainment area to attainment for the 1997 eight-hour ozone NAAQS and the initial 10-year ozone maintenance plan for this area on Thursday, January 31, 2013; (78 FR 6741). We point out that the Boston-Manchester-Portsmouth (SE), NH maintenance area is within the Ozone Transport Region. As such, General Conformity regulations establish applicability rates for ozone maintenance areas inside an ozone transport region as equal to or exceeding the rate of 100 tons per year of nitrogen oxides (NOx) and/or 50 tons per year of volatile organic compounds (VOCs) see 40 CFR §93.153(b)(2).

Applicability rates are based on the total of direct and indirect emissions of the criteria pollutant or precursor in a nonattainment or maintenance area caused by a Federal action. The annual operational emissions that would result from KC-46A operations at Pease ANGS is calculated at 158.92 tons of NOx and 16.93 tons of VOC as stated in Table 4.3.2-1 "Comparison of Baseline and Proposed Annual Operational Emissions, 157 ARW," on page 4-66 of the Draft EIS (also Table 3.3-2 on page D2-5). However, concurrent with the beddown of the 12 KC-46A, twelve existing KC-135 aircraft would be retired out of the Air National Guard fleet. The net annual emissions from the proposed Pease ANGS Alternative are calculated at 83.60 tons of NOx and 13.31 tons of VOC. We concur with the DEIS that the annual level of NOx and VOC from the Pease ANGS Alternative are below the General Conformity applicability rate of 100 tons per year of NOx and 50 tons per year of VOC. Therefore, General Conformity is not triggered.

Stormwater

The project will require coverage under a National Pollution Discharge Elimination System (NPDES) construction general permit (CGP) for land disturbance of one or more acres of land. If this threshold is surpassed, the Pease ANGS would need to submit a Notice of Intent and obtain coverage under the CGP and develop and implement a stormwater pollution prevention plan meeting the requirements of the most recently issued CGP.

The CGP is available at: http://www.epa.gov/npdes/pubs/cgp2012_finalpermit.pdf. Additional information is available at: http://cfpub.epa.gov/npdes/stormwater/cgp.cfm.

The completed project may also be subject to the multi-sector general permit for stormwater discharges associated with industrial activity – air transportation sector. Moreover, if any dewatering needs to occur for project construction, the project may also be subject to the remediation general permit if there is dewatering discharge. The FEIS should discuss these various permit requirements and the steps the Air Force will take to ensure compliance with stormwater discharge regulations.

Since this is federal facility the project should be designed and operated in a manner consistent with Section 438 of the Energy Independence and Security Act, which provides: "The sponsor of any development or redevelopment project involving a federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow." 42 U.S.C. § 17094. Additional guidance is available at: http://www.epa.gov/owow/NPS/lid/section438/.

Water Supply

The DEIS does not describe or acknowledge a drinking water supply well called the Pease Trade Port Haven Well [EPA ID#1951020-002] operated by the Portsmouth Water Works. The proposed installation lies within the well's source water protection area (SWPA). This gravel-packed supply well is approximately 4,200 feet south of the proposed facility. The FEIS should be updated to include this water supply resource.

The DEIS should include the latest raw water quality analyses for the Pease Trade Port Haven Well (i.e., inorganics, VOCs, SOCs, PAHs, etc.) from the Portsmouth Water Works to describe current ground water quality under the proposed installation location. This will provide a basis for a comparison of future potential drinking water impacts, if any, from KC-46A activities. In addition, any nearby monitoring wells should be sampled for the same constituents. The DEIS' description of ground water impacts (page 4-74) mentions only a 0.5 acre increase in impervious surface from the project. No mention whatsoever is made of ground water quality.

The fate and transport of storm water, deicing chemicals or fire-fighting agents in the vicinity of the proposed installation are not clear in the document. The FEIS should describe the present composition of storm water runoff; and what, if any, changes in impacts will occur to surface or ground waters from the new facility construction and operation.

Pittsburgh ANGS Alternative

Hazardous Materials and Waste

The DEIS (page 3-105) notes, "Nineteen ASTs occur on the 171 ARW installation and are used to store diesel, jet fuel, motor gasoline, aqueous film forming foam, potassium

acetate, developer, dye penetrant, emulsifier, and rinse solution." The location of the ASTs is not shown on the site. The FEIS should provide a map that depicts the location of the ASTs in relation to the proposed facility construction. The safety measures integrated into the AST should also be discussed.

The DEIS (page 5-27) notes, "Under Alternative #4, the total number of flying hours for the 171 ARW would increase approximately 34 percent; therefore, throughput of petroleum substances and hazardous waste streams would be expected to increase commensurately." The FEIS should discuss if the current hazardous waste management systems can handle and treat increased hazardous waste and if additional options have been considered for incorporation to respond to the projected increase.

The Pittsburgh IAP relies on two in-stream treatment ponds to treat deicing wash. The ANG should consider upgrading its deicing facility to meet current standards.

The DEIS (page 3-106) notes, "Hazardous wastes initially accumulated at a SAP are accumulated in appropriate containers before being transferred to the installation CAP." "The installation CAP is located in Building 501/502 (171 ARW 2009, Tower 2013b)." Building 501/502 is not identified on a map in the DEIS. The FEIS should explain whether these buildings are within the study area, depict them on a map and discuss safety procedures incorporated into the building design. The FEIS should also describe the approximate increase in waste generated as a result of the Proposed Action and if the buildings would have the capacity to handle the additional waste.

The DEIS (page 3-106) notes, "OWSs are used to separate oils, fuels, sand, and grease from wastewater and to prevent contaminants from entering the sanitary sewer and stormwater drainage systems. Fifteen OWSs are located on the 171 ARW installation. These OWSs primarily receive discharge from floor drains in maintenance area (171 ARW 2012c)." The FEIS should provide the location of the fifteen OWSs located on the 171 ARW installation and describe whether more are necessary to compensate for the proposed action and/or to control waste from entering the sanitary sewer and stormwater drainage systems.

The DEIS (pages 3-106 and 3-107) identifies three closed ERP sites and two closed Areas of Concern (AOC) at the 171 ARW installation. The DEIS did not discuss if contaminated soils were removed if groundwater is being treated and whether these areas are subject to land control restrictions. Since the Proposed Action can occur on or in proximity to existing ERP sites and AOCs, this information and how the proposed action may affect them, is critical to assessing environmental impacts and should be provided in the FEIS.

Environmental Justice and the Protection of Children

The DEIS (page 3-110) discusses minority and low-income populations as well as children under the age of 18 living in the vicinity of the Pittsburgh ANGS. However, the FEIS should identify census tracts and blocks depicting these populations on a map to show possible impacts and support text and tables provided.

Aircraft Noise

The DEIS (page 4-89) notes, "Aircrews associated with the KC-46A would continue to practice closed patterns, including tactical procedures in which the aircraft climbs or descends in the immediate vicinity of the airfield." "This procedure is currently being flown with the KC-135; however most tactical procedures would be accomplished in the simulator and at the other locations away from Pittsburgh IAP." The FEIS should estimate the number of tactical procedures to take place in the simulator versus other locations and identify the other locations where this training will occur and associated impacts.